

RE: IGI Parcel North of Patterson Street

Carmen Avon Manning

to:

James Haklar

08/31/2010 11:49 AM

Cc:

john.ferrante, rajjetley

Hide Details

From: "Carmen Avon Manning" < Carmen. Avon Manning@e2pm.com>

To: James Haklar/R2/USEPA/US@EPA,

Cc: <john.ferrante@e2pm.com>, <rajjetley@gmail.com>

History: This message has been replied to.

2 Attachments





Sampling Analysis Dates table.pdf Revised FIG 3.pdf

Jim,

We appreciate your prompt review of the self implementing notice. The following addresses the questions from your August 27th email.

1. Since this is a "new" self-implementing notice, please provide me the ANALYSIS dates for all of the samples (this is required per the regulations). You can even provide me with ranges for the different sampling events.

Attached is a pdf document which includes each sample id, the sample date, analysis date and the analytical results.

2. Please verify that, on Figure #3, the scale bar under "Enlarged Area" is actually 1'' = 20' and not 1'' = 10' as currently specified (I think this is a typo).

We apologize for the typo. Attached is a revised Figure 3.

3. Please verify that the maximum depth of the excavation is 24" from original ground surface and whether the excavation was backfilled (and the type of (clean?) material used for backfilling.

The excavation which was conducted in April 2010 was 24 inches from the original ground surface. The excavation was not backfilled at that time. The area will be backfilled with imported clean fill when the site is graded for development.

4. Please explain how the stockpiled soils in Figure #1 are stored (e.g., on/under a tarp, etc.). While not relevant for this approval, please note that EPA may have an issue with designating the parking area as low occupancy, if it is to be used for residential parking (so the maximum PCBs allowed in this areas would be 10 ppm, and we know that at least one of the stockpiles has PCBs above that and would have to be moved).

The stockpiled soil was placed on a tarp in the area shown on Figure 1. This area is the designated low occupancy parking area for the warehouse. Figure 1 indicates the cleanup level as less than 100 mg/kg PCB in accordance with the low occupancy TSCA requirements. However, the area will be remediated to comply with the NJDEP non residential soil cleanup criteria of 50 mg/kg. Please note that the area

Jim

James S. Haklar, Ph.D., P.E. Sr. PCB Disposal Specialist Division of Enforcement and Compliance Assistance

(732) 906-6817